

Daniel R. Watkins, Esq.
Nevada State Bar No. 11881
dw@wl-llp.com
Brian S. Letofsky, Esq.
Nevada State Bar No. 11836
Brian.Letofsky@wl-llp.com
WATKINS & LETOFSKY, LLP
8935 S. Pecos Rd., Ste 22A
Las Vegas, NV 89074
Office:(702) 901-7553; Fax: (702) 974-1297
Attorneys for Defendant, Watkins & Letofsky, LLP

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMY BUCHANAN

Plaintiff,

vs.

WATKINS & LETOFSKY, LLP., a Nevada
Limited Liability Partnership; and DOES 1-X,
inclusive,

Defendants.

Case No.: 2:19-cv-00226-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR FILING
MOTIONS FOR SUMMARY
JUDGMENT**

[FIRST REQUEST]

Pursuant to this court's order on Defendant's Motion for Summary Judgment (ECF No. 55), the Stipulated Discovery Plan and Scheduling Order (ECF No. 58) and Federal Rule of Civil Procedure 26(f), and in accordance with LR IA 6-1, Defendant, Watkins & Letofsky, LLP, and Plaintiff, Amy Buchanan, by and through their respective counsel, stipulate and hereby submit to the Court this joint request for a 30 day extension of the deadline for filing dispositive motions as contained in the Stipulated Discovery Plan and Scheduling Order (ECF No. 58) from October 30, 2023 through and including November 29, 2023. The Parties represent and show the court as follows:

1. The discovery cut-off date from the Stipulated Discovery Plan and Scheduling Order (ECF No. 58) was originally set for September 29, 2023, and the dispositive

1 motion filing deadline was set for 30 days later on October 30, 2023 (the 29th being
2 a Sunday).

- 3 2. The Court granted Plaintiff an extension of time to complete the necessary
4 depositions to October 9, 2023, as travel plans for the witnesses made it difficult to
5 schedule the in-person depositions (ECF No. 61).
- 6 3. Counsel for Defendant, Daniel Watkins, underwent significant shoulder surgery on
7 October 6, 2023, limiting his time in the office for several weeks.
- 8 4. The parties completed the necessary depositions on October 9, 2023.
- 9 5. With the limited time in the office and the time needed to obtain the deposition
10 transcripts, the parties request a 30-day extension of the dispositive motion filing
11 deadline making the new deadline November 29, 2023. This first joint request for
12 an extension of time of the deadline to file dispositive motions.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

Good cause exists for the proposed extension of the deadline for filing dispositive motions, and the parties believe that an extension is necessary. Based on the foregoing, the parties have agreed that the deadline for filing dispositive motions should be extended until Wednesday November 29, 2023.

DATE: October 18, 2023

WATKINS & LETOFSKY, LLP

KEMP & KEMP

/s/ Daniel R. Watkins

/s/ J.P. Kemp

Daniel R. Watkins, Esq.
Nevada State Bar No. 11881
dw@wl-llp.com
Brian S. Letofsky, Esq.
Nevada State Bar No. 11836
Brian.Letofsky@wl-llp.com
8935 S. Pecos Rd., Ste 22A
Las Vegas, NV 89074
Office: (702) 901-7553; Fax: (702) 974-1297
Attorneys for Watkins & Letofsky, LLP

J.P. Kemp, Esq.
7435 W. Azure Drive, Suite 110
Las Vegas, Nevada 89130
jp@kemp-attorneys.com
Phone (702) 258-1183; Fax: (702) 258-6983
Attorney for Amy Buchanan

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

Dated: October 26, 2023